

EXCEL INDUSTRIES, INC.

Document: General Correspondence
From: D.L. White, V.P.
Excel Industries, Inc.
1120 North Main
Elkhart, IN 46514
(219) 264-2131
To: Ralph Pickard
Tech. Secretary, Env. Mgmt. Board
State of Indiana
1330 W. Michigan St.
Indianapolis, IN 46206
Date: 11/16/82
Summary: Responses to State of IN letter dated 10/6/82.

- They note that mfg. operations ceased 2 years prior to receipt of 104(e) letter, and this adds difficulty to answering questions and locating documents.
- Trichloroethylene (TCE) was used at Excel Corp. facility from about 1945 until January 1981 when mfg. operations ceased. Excel Corp. has records indicating amounts purchased between '75 - '79. Additionally, 486 gallons of 111-trichloroethylene were purchased. It can be reasonably estimated that no more than 12,000 gallons of TCE were purchased per year, and prior to '75, the amount purchased would have been significantly less.
- No knowledge of the use of TCE by manufacturers, owners of, or other occupants of the site now occupied by Excel Corp. The New York Central Railroad, Shell Oil Co., and Yoder Oil Co. all occupied parts of the Excel Corp. property at different times. It is unknown whether any of these companies stored or used TCE.
- TCE was used as a degreasing agent to clean metal parts prior to welding.
- TCE was stored in a storage tank outside the Excel Corp. building.
- Until 1971, the degreaser was cleaned two to four times a year. Prior to cleaning, the level of material was allowed to run down to about 35-40 gallons and this residual TCE, oil, and dirt mixture was pumped into barrels which were returned to the vendor for reclamation. In 1971, Excel bought a still to perform in-house TCE reclamation. The sludge from the still contained much lower concentrations of TCE. This material, which was pumped from the still and placed in barrels, was returned to the vendor. Since 1978, all TCE sludge has been disposed of pursuant to applicable hazardous waste disposal regulations. The amounts disposed of were 550 gal's. in 9/78, 935 gal's. in 6/79, 385 gal's. in 6/80, and 220 gal's. in 12/80. While they have no records to that effect, there could have been occasions prior to '78 when TCE sludge was hauled away by commercial refuse haulers.

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rather than sent back to the vendor. It is also possible that prior to about 1960, the maintenance man cleaning the degreasing tank could have disposed of TCE sludge by either sending it to a commercial dump or by dumping it on the building site. If this happened, the quantity dumped would have been in the range of 80-120 gal./yr. The dumping sites are most probably now located under buildings erected in '55, '63, and '66.

- No TCE was dumped on the premises since the early '60s, & if any was dumped prior to that time, the amounts would have been minimal. The probable sites of the dumping were cleaned of trash, filled, and now under buildings.

Document: Domestic Return Receipt for Certified mail sent to Excel Industries, Inc.
Date: 4/26/89

Document: Domestic Return Receipt for Certified mail sent to Excel Industries, Inc.
Date: 5/1/89

Document: Response to Information Request Letter
From: Jacqueline Simmons, Attorney
Ice Miller Donadio & Ryan
One America Square, Box 82001
Indianapolis, IN 46282-0002
(317) 236-2100

To: Susan Swales, U.S. EPA Region V
Date: 5/26/89

Summary:

- Copy of Hazardous Waste manifest dated 12/22/77.
- SPC-17 Liquid Waste Removal Record Industry Report, 12/22/77.
- Responses to EPA 104(e) letter attached to an undated letter from Norm Niedergang, Chief, Remedial and Enforcement
- Responding Parties: Ken Nemes, Risk & Safety Mgr. Margaret Kuehne, 58477 Hilly Ln., Elkhart, IN 46517(former employee)
Robert Pabreza, G.M., Excel of Tennessee, Lawrenceburg, TN
Jacqueline A. Simmons, ICE MILLER DONADIO & RYAN, One America Square, Box 82001, Indianapolis, IN 46282
- A SPC-17 report dated 1/1/77 through 1/31/78 submitted to Indiana Stream Pollution Board and an agreement for disposal of waste dated 12/22/77 between Excel & Michiana Solid Refuse Services were reviewed & attached.

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- No other persons who have additional knowledge or more detailed info.
- The primary business of Excel or its predecessor, 1120 North Main Street Corp., was the manufacture of auto & truck sash and window assemblies, school bus sashes, recreational vehicle sashes, stainless steel tubing, windshields and sashes for military trucks, and other military truck components.
- The mfg. process involved standard production techniques such as rolling, welding, stamping, painting, plating, cleaning, and assembly. Raw materials used include glass, rubber, steel, aluminum, glazing compounds, solvents, paints, and plastics.
- Wastes were disposed by: Himco Waste-Away Svc., Inc., Michiana Solid Refuse Services, Inc., a Division of Sturgis Iron & Metal, Inc., Robert Genth
- Excel Industries, Inc. is still attempting to locate all info. and documents relating to waste disposal from Excel Corp. or 1120 North Main Street Corp. mfg. facility from '60 - '77.
- No records indicate that any waste was dumped on-site, although it is believed that broken glass may have been deposited in areas that were subsequently filled and upon which buildings were constructed.

Document: Response to Information Request Letter
From: Ken Nemes, Risk & Safety Mgr.
Excel Industries, Inc.

To: Susan Swales, U.S. EPA Region V
Date: 6/12/89

Summary:

- Insurance coverages for Excel Corp./Excel Industries, Inc. attached.
- Responses to EPA 104(e) letter attached to an undated letter from Mary Gade, Office of Superfund
- Wastes were disposed of during the time period in question by one of the following: Himco Waste-Away Svc, Inc., Michiana Solid refuse Services, a Division of Sturgis Iron & Metal, Inc., Robert Genth
- Excel cannot locate shipping doc's. or receipts regarding transportation, storage, or disposal of any wastes. The documents located are the same as in the response to 104(e) response #2, dated 5/26/89
- Excel is still attempting to locate documents regarding disposal of wastes at Himco.
- Excel is still trying to determine the total volume of waste generated by Excel or its predecessor at the Himco Site.
- Attached is a listing of all liability insurance coverage

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Document: Response to Special Notice Letter
From: Jacqueline Simmons, Attorney
To: Susan Swales, U.S. EPA Region V
Date: 9/20/90
Summary:

- Response to EPA letter dated 9/4/90
- Decline to reimburse EPA for costs incurred to date and to connect homes near Himco to municipal water supply.
- Attorneys currently have no evidence that Excel Corp. or 1020 North Main Street Corp. sent any hazardous substances to Himco dump.
- Know of no waste stream generated by either of the above two listed companies that would cause elevated levels of sodium in groundwater.
- Therefore, decline to reimburse EPA

Document: Copy of 104(e) letter
Summary:

- Unsigned, undated draft copy of 104(e) letter sent to Excel Industries, Inc., re: Himco Dump.